

Teresa M. Corbin (SBN 132360)
Christopher Kelley (SBN 166608)
Erik K. Moller (SBN 147674)
HOWREY SIMON ARNOLD & WHITE, LLP
301 Ravenswood Avenue
Menlo Park, California 94025
Telephone: (650) 463-8100
Facsimile: (650) 463-8400

Attorneys for Defendant Aeroflex, Inc., et al.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RICOH COMPANY LTD.,

Plaintiff,

VS.

AEROFLEX, INC., ET AL.

Defendant.

Case No. CV 03-04669 MJJ

**MISCELLANEOUS ADMINISTRATIVE
REQUEST TO FILE CERTAIN EXHIBITS
UNDER SEAL**

Plaintiff Synopsys, Inc. (“Synopsys”) files this Miscellaneous Administrative Request with this Court pursuant to Civil Local Rule 7-10(b) for permission to file under seal the following exhibits:

1. Exhibit B, a true and correct copy of pages 1-8 and 35-60 from the July 15, 2003 deposition of Hisashi Ishijima taken in *Ricoh Company, Ltd., v. Aeroflex Incorporated, et al.*, Civil Action No. 03-4669MMC pending in the United States District Court for the Northern District of California to Declaration of Erik Moller in Support of Defendants’ Motion to Stay Ricoh’s Customer Suit;

2. Exhibit C, a true and correct copy of Plaintiff's Answers to Defendant AMI Semiconductor, Inc.'s First Set of Interrogatories (1-2) dated July 15, 2003 July 21, 2003 in *Ricoh Company, Ltd., v. Aeroflex Incorporated, et al.*, Civil Action No. 03-4669MMC pending in the United States District Court for the Northern District of California to Declaration of Erik Moller in Support of Defendants' Motion to Stay Ricoh's Customer Suit.

3. Exhibit D, a true and correct copy of the Declaration of Alan MacPherson in Support of Defendants' Motion to Stay or, in the Alternative, Transfer dated June 10, 2003 and filed in *Ricoh Company, Ltd. v. Aeroflex Incorporated, et al.*, Civil Action No. 03-103-GMS.

Because the above documents include or refer to materials produced in discovery by defendant Ricoh Company, Ltd. and designated "Confidential" in *Ricoh Company, Ltd. v. AeroFlex Inc., et al.*, Case No. 03-4669MMC, this request is made pursuant to the Stipulated Protective Order entered on June 9, 2003 in that action.

Submitted herewith is a proposed order granting Synopsys's request to file the foregoing documents under seal.

Dated: November 7, 2003

HOWREY SIMON ARNOLD & WHITE, LLP

By: /s/
Erik K. Moller
Attorneys for Plaintiff
Synopsys, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RICOH COMPANY LTD.,

Plaintiff,

vs.

AEROFLEX INC., ET AL.,

Defendant.

) Case No. CV 03-4669 MJJ

)

) **[PROPOSED] ORDER GRANTING**
) **MISCELLANEOUS ADMINISTRATIVE**
) **REQUEST TO FILE CERTAIN EXHIBITS**
) **UNDER SEAL**

)

)

)

)

)

Plaintiff Synopsys, Inc. ("Synopsys") has filed a Miscellaneous Administrative Request with this Court pursuant to Civil Local Rule 7-10(b) for permission to file under seal the following exhibits:

1. Exhibit B, a true and correct copy of pages 1-8 and 35-60 from the July 15, 2003 deposition of Hisashi Ishijima taken in *Ricoh Company, Ltd., v. Aeroflex Incorporated, et al.*, Civil Action No. 03-4669MMC pending in the United States District Court for the Northern District of California to Declaration of Erik Moller in Support of Defendants' Motion to Stay Ricoh's Customer Suit;

2. Exhibit C, a true and correct copy of Plaintiff's Answers to Defendant AMI Semiconductor, Inc.'s First Set of Interrogatories (1-2) dated July 15, 2003 July 21, 2003 in *Ricoh Company, Ltd., v. Aeroflex Incorporated, et al.*, Civil Action No. 03-4669MMC pending in the United

1 Stated District Court for the Northern District of California to Declaration of Erik Moller in Support of
2 Defendants' Motion to Stay Ricoh's Customer Suit.

3 3. Exhibit D, a true and correct copy of the Declaration of Alan MacPherson in Support of
4 Defendants' Motion to Stay or, in the Alternative, Transfer dated June 10, 2003 and filed in *Ricoh*
5 *Company, Ltd. v. Aeroflex Incorporated, et al.*, Civil Action No. 03-103-GMS.

6 Dated: _____
7
8
9

10 By: _____
11 Honorable Martin J. Jenkins

12 Submitted November 7, 2003 by:
13 Howrey Simon Arnold & White, LLP
14
15

16 By: _____
17 Erik K. Moller
18 301 Ravenswood Avenue
19 Menlo Park, CA 94025
20 Telephone: (650) 463-8100
21 Facsimile: (650) 463-8400
22 Attorneys for Defendants
23
24
25
26
27
28

Teresa M. Corbin (SBN 132360)
 Christopher Kelley (SBN 166608)
 Erik K. Moller (SBN 147674)
 HOWREY SIMON ARNOLD & WHITE, LLP
 301 Ravenswood Avenue
 Menlo Park, California 94025
 Telephone: (650) 463-8100
 Facsimile: (650) 463-8400
 Attorneys for Defendant Aeroflex, Inc., et al.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

RICOH COMPANY LTD.,)	Case No. CV 03-04669 MJJ
)	
Plaintiff,)	PROOF OF SERVICE
)	
vs.)	
)	
AEROFLEX, INC., ET AL.,)	
)	
Defendant.)	
)	
)	
)	
)	
)	

STATE OF CALIFORNIA)	
)	ss.:
COUNTY OF SAN MATEO)	

I am employed in the County of San Mateo, State of California. I am over the age of 18 and not a party to the within action. My business address is 301 Ravenswood Avenue, Menlo Park, CA 94025.

On November 7, 2003, I served the within:

Exhibit B to Declaration of Erik K. Moller In Support of Defendants' Motion to Stay Ricoh's Customer Suit;

Exhibit C to Declaration of Erik K. Moller In Support of Defendants' Motion to Stay Ricoh's Customer Suit;

Exhibit D to Declaration of Erik K. Moller In Support of Defendants' Motion to Stay Ricoh's Customer Suit.

by placing true copies thereof in a sealed envelope(s) addressed as stated below and causing such envelope(s) to be delivered via:

☒ (PERSONAL SERVICE) I caused each such envelope to be delivered by hand to the offices of the interested party below.

Jeffrey B. Demain
Jonathan Weissglass
Altshuler, Berzon, Nussbaum, Rubin & Demain
177 Post Street, Suite 300
San Francisco, CA 94108

☒ (OVERNIGHT DELIVERY) by depositing in a box or other facility regularly maintained by Federal Express, an express service carrier, or delivering to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed as stated below, with fees for overnight delivery paid or provided for and causing such envelope(s) to be delivered by said express service carrier.

Edward A. Meilman
Dickstein Shapiro Morin & Oshinsky, LLP
1177 Avenue of the Americas
New York, NY 10036

Gary M. Hoffman
Dickstein Shapiro Morin & Oshinsky, LLP
2101 L Street NW
Washington, DC 20037

I declare under penalty of perjury that I am employed in the office of a member of the bar of this Court at whose direction the service was made and that the foregoing is true and correct.

Executed on November 7, 2003, at Meno Park, California.

Gayle L. Jacob
(Type or print name)

/s/

(Signature)